

Message

From: Molloy, Jennifer [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D58B88880EC245048A8B17A62EB915FA-MOLLOY, JENNIFER]
Sent: 6/8/2020 11:23:14 AM
To: Miller, Wynne [Miller.Wynne@epa.gov]; Zobrist, Marcus [Zobrist.Marcus@epa.gov]; Kloss, Christopher [Kloss.Christopher@epa.gov]; Witt, Richard [Witt.Richard@epa.gov]
Subject: FW: Comments on Executive Order "Promoting American Seafood Competitiveness and Economic Growth" (EO 13921, May 7, 2020).
Attachments: aquaculture combined petition 2.pdf; aquaculture combined petition 1.pdf

These comments are very similar to the ones they submitted on the draft permit for the Kampachi *Vilella* demonstration project in the Gulf of Mexico. We should discuss whether or not this is something we want to try to get a little out in front of.

Jenny Molloy
U.S. EPA
Water Permits Division
703.403.3827, while working remotely
molloy.jennifer@epa.gov

From: Templeton, Hallie <HTempleton@foe.org>
Sent: Friday, June 5, 2020 11:58 AM
To: Molloy, Jennifer <molloy.jennifer@epa.gov>; david.o'brien@noaa.gov; Clete Otoshi - NOAA Federal <Clete.Otoshi@noaa.gov>; brian.fredieu@noaa.gov; kristy.beard@noaa.gov; cynthia.sandoval@noaa.gov; robert.b.blair@who.eop.gov; sbaldovsky@ostp.eop.gov; Todd.T.Semonite@usace.army.mil; radams@nsc.eop.gov; Steve Leathery - NOAA Federal <steve.leathery@noaa.gov>; James.bsherk@who.eop.gov; Joseph.j.grogan@who.eop.gov; Tomas.j.philipson@cea.eop.gov; Kevin.c.corinth@cea.eop.gov; scott.a.spellmon@usace.army.mil; Dennis.tremethick@usace.army.mil
Cc: Grace Chan <gchan@foe.org>
Subject: Comments on Executive Order "Promoting American Seafood Competitiveness and Economic Growth" (EO 13921, May 7, 2020).

Good morning,

I hope my email finds you and your staff in good health. I am writing to deliver 26,582 comments from Friends of the Earth members and activists who are concerned about the recent Executive Order on Promoting American Seafood Competitiveness and Economic Growth.

Friends of the Earth joins these comments, and respectfully requests that all public officials charged with implementing the various policies contained in the EO take into consideration the recommendations contained in our comment letter (pasted below, and attached with signatures).

Very sincerely,
Hallie Templeton

I am writing to share my grave concerns with the recent Executive Order on Promoting American Seafood Competitiveness and Economic Growth, which the White House issued on May 7, 2020. There are a number of significant problems with the aquaculture policies set forth in this Executive Order, warranting full reconsideration by the White House and associated public officials.

Marine finfish aquaculture facilities pose extreme risks to the environment and public health. They can cause massive, catastrophic fish spills -- like the release of more than 263,000 Atlantic salmon from a floating feedlot in Washington

State in 2017 -- which spread disease, risk genetic degradation, and create unnecessary competition with our already struggling native fish stocks. They attract and harm predators and other wildlife. They are corporate-driven, which only means higher profits at the expense of sustainable operations and quality products. These floating factory farms are leading to the demise of our wild fishing communities and related industries by placing downward pressure on fishing prices and creating competition for limited marine space. It is clear that these impacts far outweigh the benefit to fish farming corporations, which stand to profit off public waterways and natural resources.

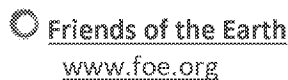
Because of these impacts, countries like Denmark and Canada (viewed as leaders in aquaculture) are now moving away from marine finfish aquaculture along their coasts. The United States should be supporting responsible and sustainable seafood production instead of streamlining permits for an industry that has clear, documented, longstanding harm.

Therefore, I was alarmed over the Executive Order for many reasons and suggest reconsideration of the following policies. First, it includes a dangerous and unnecessary mandate on public officials to meet deadlines as soon as 30 days after the EO's publication. Given the ongoing COVID-19 pandemic, and inherent uncertainty for the foreseeable future, I urge you to expand these deadlines by at least a year. Second, I urge you to incorporate stronger environmental review requirements, including removing the 2-year limit for EIS completion and allowing a stronger role for EPA in the process. Third, the EO should remove any inclusion for permitting of marine finfish aquaculture. This form of fish cultivation is outdated, dangerous, and destructive. Instead, I urge you to support alternative finfish aquaculture methods with fewer risks, such as fully recirculating aquaculture and aquaponic systems on land, which recycle all water without regular discharge, particularly those which utilize regenerative energy. Finally, I request that the Order mandate exploring new domestic markets and processing opportunities for seafood in the United States, rather than supporting international trade of these products. To truly benefit our seafood industry and economy, we should focus on keeping American seafood here in the United States.

These are just a few of the many concerns I have with the Executive Order. Thank you for considering my opinion.

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